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Clerk of the Court
United States Bankruptcy Court
1101 Court Street, Room 166
Lynchburg, Virginia 24504
May 21, 2021

Dear Honorable Rebecca B. Connelly,

I am writing you today in reference to **Case 20-60860-RBC**, Service Dogs by Warren Retrievers, Inc. and the Global Resolution Motions that will be before you on June 3, 2021. I **strongly object** to "The Marianne Settlement Motion."

Marianne Warren was complicit in the acts of Charles D. Warren and furthered his actions by providing him money to fund his lifestyle. During Mr. Warren's first deposition in this case to Mr. Scott, he stated, under oath, that he did not have a mortgage on the Bordeaux Farms, LLC property as he had "very generous parents." This statement is supported by the fact that during the Bordeaux Farm, LLC restructuring filed 07/24/19, Case 19-60607, no bank was listed as a secured creditor. How could Mr. Warren payoff a nearly \$650,000 mortgage between 2011 and 2019 when according to the SDWR tax statements he was making slightly more than \$100,000 per year?

Hundreds of families paid money to Service Dogs by Warren Retrievers, Inc. (SDWR) **to improve their child's quality of life**. Every family was negatively affected by Warren's behavior. Each family may have: (1) **received a dog** from SDWR that is **not suitable as a service dog**, as they were contractually obligated to do if the family fundraised in full, (2) **fundraised part of the money** for a service dog and received no dog and **none of their money back**, (3) received a dog but **did not receive the training and lifetime health guarantee** as SDWR was contractually obligated to provide, or (4) a family did **not** receive a dog as SDWR was contractually obligated to do even if the they met the fundraising goal.

Marianne Warren is not a bank or a secured creditor. She gifted money to her son. She gambled on her son and lost. If she was not listed as a secured creditor during the Bordeaux Farm, LLC bankruptcy filing, then how has her status changed in this bankruptcy case?

For these reasons, I believe that Marianne Warren should not be permitted to have any of the proceeds of the sale of the property. Therefore, I **strongly object** to the "The Marianne Settlement Motion."

Thank you.


Heather O'Connor

cc: Hirschler Fleischer, PC